

EXHIBIT 15

WILMERHALE

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Re: *In re Pegasystems Securities Litigation*, No. 22-cv-11220-WGY (D. Mass.)

Counsel:

We write on behalf of Defendants Pegasystems Inc. (“Pegasystems”) and Alan Trefler (together with Pegasystems, “Defendants”) in response to Plaintiffs’ correspondence dated August 31, 2023 requesting privilege logs for productions made by Deloitte & Touche LLP (“Deloitte”) and confirmation that “the same assertions of privilege, work product, or other protections made by Pegasystems (or at Pegasystems’ request) to documents in this case, are also made to the SEC.”

With respect to privilege logs, Defendants will provide Plaintiffs with a privilege log identifying any documents that Defendants requested be redacted in Deloitte’s August 28, 2023 production to Plaintiffs. Defendants have not requested that any documents produced by Deloitte be withheld in full. Defendants’ privilege log will comply with the Fed. R. Civ. P. 26(b)(5). And it will be provided within a reasonable time following August 28, 2023. To be clear, Defendants’ provision of privilege logs identifying the relatively small number of documents that Defendants requested be redacted in Deloitte’s August 28, 2023 production to Plaintiffs does not mean Defendants agree that privilege log entries for redacted documents are necessary, without undue burden, or otherwise appropriate for documents produced with redactions by Pegasystems. Defendants do not agree at this time to provide privilege log entries for redacted documents for documents produced with redactions by Pegasystems.

Defendants will not, however, provide Plaintiffs with any privilege logs provided to the SEC identifying documents that Pegasystems requested be redacted in Deloitte’s productions to the SEC. Any such privilege logs are neither relevant nor proportional to the needs of this case, and, as set forth below, unnecessarily duplicative. Nor will Defendants provide Plaintiffs with privilege logs provided to the SEC identifying *all* documents that Pegasystems redacted or otherwise withheld from production to the SEC. To the extent Plaintiffs accept Defendants proposed compromise to resolve the parties’ dispute regarding Plaintiffs’ clone discovery request for Pegasystems’s production to the SEC, Defendants will consider providing Plaintiffs a log containing the entries on any privilege log provided to the SEC for documents dated on or before October 18, 2022.

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Finally, to the extent the same document is produced to Plaintiffs and the SEC (whether by Deloitte or by Pegasystems), Defendants confirm that Pegasystems is asserting the same claims of privilege in both matters. For this reason, privilege logs provided to the SEC identifying documents that Defendants requested be redacted in Deloitte's productions to the SEC are also unnecessarily duplicative of the privilege logs Pegasystems will provide Plaintiffs in this Action.

Sincerely,

/s/ Robert Kingsley Smith

Robert Kingsley Smith

cc: Daniel W. Halston
Erika Schutzman